



PUBLIC NOTICE

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DA 09-1789
August 11, 2009

PLEADING CYCLE ESTABLISHED FOR COMMENTS ON PETITION OF SORENSEN COMMUNICATIONS, INC. FOR DECLARATORY RULING OR LIMITED WAIVER OF THE COMMISSION'S RULES

CG DOCKET NO. 03-123
WC DOCKET NO. 05-196

Comments: August 26, 2009
Reply Comments: September 10, 2009

On April 13, 2009, Sorenson Communications, Inc. (Sorenson) filed a petition for declaratory ruling or limited waiver regarding the Federal Communications Commission's (Commission's) rule that every default provider of Internet-Protocol (IP) Relay service and video relay service (VRS) provide its users a geographically appropriate North American Numbering Plan (NANP) telephone number.¹ Sorenson claims its numbering partner is unable to obtain telephone numbers in every rate center and therefore, Sorenson is unable to provide its users that live in those unserved rate centers a geographically appropriate number.² Sorenson further argues that it is not "economically or operationally feasible" for itself or any other IP Relay or VRS provider to obtain telephone numbers in every rate center.³

Accordingly, Sorenson asks the Commission to find lawful a policy of providing users a temporary "geographically approximate" guest number from a nearby rate center when a default IP Relay

¹ See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, Sorenson Communications, Inc. Petition for Declaratory Ruling or Limited Waiver (filed Apr. 13, 2009) (Sorenson Petition); see also 47 C.F.R. § 64.611(a)(1)(ii); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791, 805, para. 28 (2008) (stating "all users of Internet-based TRS must be assigned ten-digit, geographically appropriate numbers, meaning numbers within their local rate centers."). On June 15, 2009, the Consumer & Governmental Affairs Bureau extended from June 30, 2009 to November 12, 2009 the date for the end to the permissive calling period during which Internet-based Telecommunications Relay Service providers may continue to complete the non-emergency calls of unregistered users. See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, Order, DA 09-1323 (rel. June 15, 2009).

² Sorenson Petition at 1-2, 5-10.

³ *Id.* at 1-2. Sorenson claims that adherence to the Commission's rule would result in "thousands of users" living in unserved rate centers being unable to register with a default provider before the June 30, 2009 [now November 12, 2009] deadline or at risk of having "prior registrations annulled" because they were not registered with geographically appropriate numbers. *Id.* at 2.

or VRS provider is unable to provide a geographically appropriate number.⁴ Alternatively, Sorenson asks the Commission to grant a temporary waiver of its rule to allow the assignment of temporary “geographically approximately” guest numbers.⁵

This matter shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission's *ex parte* rules. See 47 C.F.R. §§ 1.1200, 1.1206. Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentations must contain summaries of the substance of the presentations and not merely a listing of the subjects discussed. More than a one- or two-sentence description of the views and arguments presented generally is required. See 47 C.F.R. § 1.1206(b). Other rules pertaining to oral and written *ex parte* presentations in permit-but-disclose proceedings are set forth in section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b).

All filings must be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Suite TW-A325, Washington, DC 20554. Parties should also send a copy of their filings to the Competition Policy Division, Wireline Competition Bureau, Federal Communications Commission, 445 12th Street, SW, Washington, DC 20554, or by e-mail to CPDcopies@fcc.gov. Parties shall also serve one copy with the Commission's copy contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC 20554, (202) 488-5300, or via e-mail to fcc@bcpiweb.com.

Comments may be filed using the Commission's Electronic Comment Filing System (ECFS) or by filing paper copies.

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <http://www.fcc.gov/cgb/ecfs/>. Filers should follow the instructions provided on the website for submitting comments.
 - For ECFS filers, if multiple docket or rulemaking numbers appear in the caption of this proceeding, filers must transmit one electronic copy of the comments for each docket or rulemaking number referenced in the caption. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic comment by Internet e-mail. To get filing instructions, filers should send an e-mail to ecfs@fcc.gov and include the following words in the body of the message: get form <your email address>. A sample form and directions will be sent in response.
- Paper Filers: Parties who choose to file by paper must file an original and four copies of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in

⁴ Sorenson Petition at 2, 11-14. Sorenson states it will bring these situations to the attention of the Wireline Competition Bureau (Bureau) and that with the assistance of the Bureau, it will “offer users in that rate center the ability to replace their geographically approximate numbers with geographically appropriate ones.” See *id.* at 12.

⁵ *Id.* at 2, 14-16.

receiving U.S. Postal Service mail). All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- The Commission's contractor will receive hand-delivered or messenger-delivered paper filings for the Commission's Secretary at 236 Massachusetts Avenue, NE, Suite 110, Washington, DC 20002. The filing hours at this location are 8 a.m. to 7 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of *before* entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail should be addressed to 445 12th Street, SW, Washington, DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

Filings and comments are also available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC 20554. They may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC, 20554, telephone 202-488-5300, facsimile 202-488-5563, or via e-mail at fcc@bcpiweb.com.

For further information regarding this proceeding, contact Heather Hendrickson, Competition Policy Division, Wireline Competition Bureau, 202-418-7295.

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